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Of Attorneys for Defendants City of Portland, Ted Wheeler, and Chuck Lovell

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

PHILIP WOLFE, KATALINA DURDEN,
MELISSA LEWIS, JUNIPER SIMONIS,
individually, and DISABILITY RIGHTS
OREGON, an Oregon nonprofit and advocacy
corporation,

PLAINTIFFS,

v.

CITY OF PORTLAND, a municipal
corporation; TED WHEELER, in his official
capacity; CHUCK LOVELL, in his official
capacity; MULTNOMAH COUNTY, a
political subdivision of the State; MICHAEL
REESE, in his official capacity; TRAVIS
HAMPTON, in his official capacity; CHAD
WOLFE, in his individual and official
capacity; DONALD WASHINGTON, in his
individual and official capacity; and DOES 1-
100, individual and supervisory officers of
local, state, and federal government,

DEFENDANTS.

3:20-cv-01882-BR

DECLARATION OF DANIEL SIMON

**(In Support of Motion for Extension of
Time to File Appearance)**

I, Daniel Simon, being first duly sworn, do depose and say:

1. I am the attorney representing City of Portland, Ted Wheeler, and Chuck Lovell in the above-entitled matter and I make this declaration in support of defendants' request for an extension of time in which to file an initial appearance.

2. Plaintiff Philip Wolfe filed this case in the United States District Court for the District of Oregon on November 1, 2020.

3. Defendants City of Portland were served with the Summons and Complaint on November 9, 2020.

4. Defendants City of Portland's response to plaintiff's Complaint is due January 08, 2021. In order to conduct a background investigation, contact and review the lawsuit with the various named defendants and prepare and file a meaningful response to plaintiffs' Complaint, defendants City of Portland, Ted Wheeler, and Chuck Lovell request a 60-day extension of time, up to and including March 08, 2021 in which to file a first appearance.

5. Plaintiffs' attorney, John C. Clarke, has no objection to this request for an extension of time.

6. This motion is presented in good faith and not for reasons of delay.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: January 6, 2021



Daniel Simon